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January 23, 2018

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Wireless Emergency Alerts*, PS Docket 15-91

Dear Ms. Dortch:

The collaborative efforts of FEMA, the wireless industry and Alert Originators in implementing the Wireless Emergency Alert (“WEA”) system have contributed significantly to the safety of wireless consumers. The draft Order in this proceeding would make a number of important improvements in the system, the most significant of which is enhancement of the Commission’s geo-targeting rule to address devices that are more than 1/10th of a mile outside of a target area. Verizon understands and agrees with the importance of more precise geo-targeting to increase the utility and effectiveness of WEAs, and, with a few clarifications CTIA and AT&T have recommended, we believe that meeting the Commission’s proposed 1/10th of a mile standard will be technically feasible.¹

The proposed November 30, 2019 deadline for meeting that standard is very aggressive, although Verizon appreciates the importance of quick action when it comes to improving the WEA system. This deadline is feasible if all stakeholders – including OEMs, providers, and standards-setting bodies – redouble their efforts. Given the stakes, we agree that we should all work diligently to make this goal workable, and Verizon will do its part. While meeting that goal will be a significant challenge, Verizon commits to work diligently, recognizing that doing so will require coordination with and active engagement of other critical stakeholders, including equipment manufacturers and standards-setting bodies. For example, to meet the deadline, a number of independent steps will need to be completed quickly and in a coordinated fashion by different stakeholders: service providers and equipment vendors must develop important industry standards, implement those standards into devices and networks, and conduct extensive testing before offering handsets with the required geo-targeting capabilities. In the meantime, we also will analyze whether it is possible to meet the new rules through software changes alone, without more substantial chipset and hardware changes.

In addition, Verizon appreciates several helpful aspects of the draft Order that should help us focus on complying with the expedited geo-targeting deadline. The geo-targeting standard as defined in

¹ See, e.g., CTIA Ex Parte Letter, PS Docket No. 15-91 (Jan. 19, 2018); AT&T Ex Parte Letter, PS Docket No. 15-91 (Jan. 16, 2018, as corrected Jan. 19, 2018).

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the rule and paragraph 9 of the draft Order, for example, better reflects wireless location capabilities than the Commission's original proposal. And aligning the deadlines for Spanish language and 360-character alerts, as CTIA had previously requested, will help simplify implementation of the new rules generally. The Commission should maintain these components of the draft Order.

Sincerely,

A handwritten signature in dark ink, appearing to read "William H. Katt". The signature is fluid and cursive, with a prominent "W" and "K".